

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

CATHERINE HARRIS,

Plaintiff,

v.

GENERAL MOTORS CORPORATION,

Defendant.

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: No. 04-10007RWZ  
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**JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1(D)**

Defendant General Motors Corporation ("General Motors") and Plaintiff Catherine Harris file this Joint Statement pursuant to Local Rule 16.1(D):

**Proposed Pretrial Schedule**

The parties jointly propose the following schedule:

- (a) Motions to supplement or amend pleadings and add parties shall be filed by April 16, 2004.

**Phase I**

- (b) All fact discovery shall be completed by December 17, 2004 (no written discovery requests may be served after November 17, 2004;
- (c) Rule 26(a)(2)(B) Plaintiff's expert reports, if any, shall be served by February 18, 2005;
- (d) Rule 26(a)(2)(C) Defendant's expert reports shall be served by March 18, 2005;

**Phase II**

- (e) Depositions of experts shall be completed by May 31, 2005;
- (f) All discovery shall be completed and all discovery motions shall be filed by May 31, 2005;

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CATHERINE HARRIS,

Plaintiff,

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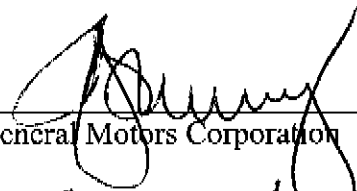
GENERAL MOTORS CORPORATION,

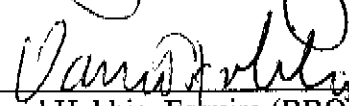
Defendant.

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**DEFENDANT'S LOCAL RULE 16(D) CERTIFICATION OF COUNSEL**

The undersigned hereby certify that counsel for General Motors Corporation has conferred with a view to establishing a budget for the costs of conducting the full course and various alternative courses -- of the litigation, and that we have also conferred with respect to considering the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4.

  
General Motors Corporation

  
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44<sup>th</sup> Floor, 600 Grant Street  
Pittsburgh, PA 15219  
Telephone: (412) 566-5966

Dated: March 10, 2004

**EXHIBIT A**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Joint Statement Pursuant to Local Rule 16.1(D), was served by First Class United States Mail, postage prepaid, this 11<sup>th</sup> day of March, 2004, as follows:

Peter J. Black, Esq.  
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Attorneys for Defendant  
General Motors Corporation